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Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

JOEL S. ARIIO, in his official capacity as
Acting Insurance Commissioner of the
Commonwealth of Pennsylvania, as statutory
Liquidator of RELIANCE INSURANCE
COMPANY (IN LIQUIDATION)

Plaintiff,

v.

CONSTITUTION STATE SERVICES, LLC
f/k/a CONSTITUTION STATE SERVICE
COMPANY

Defendant.

No. 07 Civ. 7454 (LTS)(THK)

**SUPPLEMENT TO COMPLAINT
PURSUANT TO COURT ORDER
OF SEPTEMBER 4, 2007**

Plaintiff Joel S. Ario, in his official capacity as Acting Insurance Commissioner of the Commonwealth of Pennsylvania, as statutory Liquidator (the “Liquidator”) of Reliance Insurance Company (In Liquidation) (“Reliance”), supplements paragraph 9 of the complaint as follows (supplemental text in bold typeface):

9. This Court has jurisdiction based on diversity of citizenship pursuant to 28 U.S.C. § 1332(a). Reliance is a Pennsylvania business corporation with its principal place of business in Pennsylvania. CSS is a business enterprise organized under Delaware law with its

principal place of business in Connecticut. **The sole member of CSS is The Phoenix Insurance Company, which is incorporated in Connecticut and has its principal place of business in Connecticut.** The matter in controversy exceeds the sum or value of \$75,000, as Reliance claims damages of approximately \$2.7 million.

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Liquidator of Reliance Insurance Company (In
Liquidation)*

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Dated: October 9, 2007